



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL  
Return Receipt Requested

Richard Hendey  
Manager Environmental Services  
Olin Corporation  
P.O. Box 1355  
Stanford, Connecticut 06904-1355

Re: Drew Industrial, Formerly Olin Water Services  
Kansas City, Kansas  
EPA ID No. KSD000203638

Letter of Warning/Notice of Deficiency

Dear Mr. Hendey:

The Drew Industrial facility, Kansas City, Kansas, was required by the Toxicity Characteristic (TC) Rule as prescribed in the March 29, 1990, Federal Register to submit an amended Part A hazardous waste permit application by September 25, 1990.

Form 8700-12 was submitted to the Kansas Department of Health and Environment (KDHE) by Drew Industrial on January 11, 1991. This notification of regulated waste activity added waste codes D018, D022, U002, U019, U044, U077, U134, and U220.

An amended Part A permit application must be submitted which accurately describes the waste management practices for the wastes newly regulated by the TC regulations. The Environmental Protection Agency (EPA) will only consider Part A modifications which are necessary to comply with the TC regulations. Part A modifications other than those necessary to comply with the TC regulations must be directed to the KDHE.

This request for submission of the information requested in this letter is made pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 United States Code (USC), Section 6927, which allows the EPA to request certain information for the purpose of determining compliance with the federal hazardous waste regulations.



R00073242  
RCRA Records Center



The Drew Industrial facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to EPA. Such a claim may be made by attaching a cover sheet to the requested information with a stamped or printed legend, or other suitable form of notice employing language such as "trade secret", "proprietary", or "company confidential". Minor confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by the means authorized by the procedures specified in 40 CFR Part 2, Subpart B. If no such claims are made when information is received by EPA, information may be made available to the public without further notice.

Two copies of a revised Part A permit application and an updated Form 8700-12 (if changes have occurred at the facility) must be sent within thirty (30) days of your receipt of this letter to this Agency at the letterhead address, Attention: Mr. Gene Evans, RCRA/PRMT. If you have any questions concerning this letter, please contact Mr. Evans or my staff at (913) 551-7731.

Sincerely yours,

Michael J. Sanderson  
Chief, RCRA Branch  
Waste Management Division

cc: Steve Broslavick, KDHE

Larry M. Prouty, Ashland Chemical, Inc.,  
Drew Industrial Division, Overland Park, KS

CERTIFIED MAIL  
Return Receipt Requested  
Article Number:

July 24, 1991

Richard Hendey  
Manager Environmental Services  
Drew Industrial, Formerly Olin Water Services  
3155 Fiberglass Road  
Kansas City, Kansas 66115

Re: Drew Industrial, Formerly Olin Water Services  
3155 Fiberglass Road  
Kansas City, Kansas 66115

Letter of Warning/Notice of Deficiency

Dear Mr. Hendey:

The Drew Industrial facility, Kansas City, Kansas was required by the Toxicity Characteristic (TC) Rule as prescribed in the March 29, 1990, Federal Register to submit a revised Part A permit application by September 25, 1990. The following comments address the areas that require revision or clarification before further action can be taken.

*the ~~TC~~ TC Rule*

1. In accordance with 40 CFR 270.13, this facility is to submit a revised Part A permit application by September 25, 1990, including EPA hazardous waste codes, estimated annual quantity of waste, unit of measure, process codes, topographic maps, etc.
2. In accordance with Kansas State Regulations KAR 28-31-4(c)(1), an EPA generator (EPAG) with TC wastes must submit an updated Kansas Department of Health (KDHE) Form 8700-12 by September 25, 1990. Form 8700-12 was submitted January 11, 1991. If any changes have occurred at the Drew Industrial facility since then, an updated form must be submitted along with the amended Part A permit application.

This request for submission of the information requested in this letter is made pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 United States Code (USC), Section 6927, which allows the EPA to request certain information for the purpose of determining compliance with the federal hazardous waste regulations.

The Drew Industrial facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or

Richard Hendey

Page 2

July 24, 1991

attaching to) the information, at the time of its submittal to, or review by, EPA, a cover sheet with a stamped or printed legend, or other suitable form of notice employing language such as "trade secret", "proprietary", or "company confidential". Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA, only to the extent and by the means authorized by the procedures specified in 40 CFR Part 2, Subpart B. If no such claims are made when information is received by EPA, information may be made available to the public without further notice.

Two copies of a revised Part A permit application and an updated Form 8700-12 (if changes have occurred at the facility) must be sent within thirty (30) days of your receipt of this letter to this Agency at the letterhead address, Attention: Mr. Gene Evans, RCRA/PRMT. If you have any questions concerning this letter, please contact Mr. Evans or my staff at (913) 551-7731.

Sincerely,

Michael J. Sanderson  
Chief, RCRA Branch



DRAFT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL  
Return Receipt Requested

Richard Hendey  
Manager Environmental Services  
Drew Industrial  
(Formerly Olin Water Services)  
3155 Fiberglass Road  
Kansas City, Kansas 66115

Re: Drew Industrial, Formerly Olin Water Services  
Kansas City, Kansas  
EPA ID No. KSD000203638

Letter of Warning/Notice of Deficiency

Dear Mr. Hendey:

The Drew Industrial facility, Kansas City, Kansas, was required by the Toxicity Characteristic (TC) Rule as prescribed in the March 29, 1990, Federal Register to submit an amended Part A hazardous waste permit application by September 25, 1990.

Form 8700-12 was submitted to the Kansas Department of Health and Environment (KDHE) by Drew Industrial on January 11, 1991. This notification of regulated waste activity added waste codes D018, D022, U002, U019, U044, U077, U134, and U220.

An amended Part A permit application must be submitted which accurately describes the waste management practices for the wastes newly regulated by the TC regulations. The Environmental Protection Agency (EPA) will only consider Part A modifications which are necessary to comply with the TC regulations. Part A modifications other than those necessary to comply with the TC regulations must be directed to the KDHE.

This request for submission of the information requested in this letter is made pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 United States Code (USC), Section 6927, which allows the EPA to request certain information for the purpose of determining compliance with the federal hazardous waste regulations.

DRAFT

The Drew Industrial facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on, or attaching to, the information, at the time of its submittal to, or review by, EPA, a cover sheet with a stamped or printed legend, or other suitable form of notice employing language such as "trade secret", "proprietary", or "company confidential". Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA, only to the extent and by the means authorized by the procedures specified in 40 CFR Part 2, Subpart B. If no such claims are made when information is received by EPA, information may be made available to the public without further notice.

Two copies of a revised Part A permit application and an updated Form 8700-12 (if changes have occurred at the facility) must be sent within thirty (30) days of your receipt of this letter to this Agency at the letterhead address, Attention: Mr. Gene Evans, RCRA/PRMT. If you have any questions concerning this letter, please contact Mr. Evans of my staff at (913) 551-7731.

Sincerely yours,

**DRAFT**  
Michael J. Sanderson  
Chief, RCRA Branch  
Waste Management Division

cc: Steve Broslavick, KDHE



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

## FAX COVER SHEET

TO: <u>Steve Braslavick</u>	
<u>K D H E</u>	
FAX NO: <u>(913) 296-1592</u>	
CONFIRMATION NO:	
FROM: <u>Gene Evans</u>	
PHONE: <u>(913) 551-7731</u>	MAIL CODE: <u>RCRA/PRAT</u>
DATE: <u>August 22</u>	NUMBER OF PAGES TO INCLUDE THIS COVER LETTER <u>3</u>

## COMMENTS

(XEROX COPIER 7020)	FAX MACHINE NO:	VERIFICATION NUMBER:
WSTM	COMMERCIAL 913-551-7053	913-551-7052
SPFD	FTS 2000 276-7053	276-7053
RCRA/IOWA	913-551-7521 OR 276-7521	913-551-7058 OR 276-7058
MAIL ROOM	COMMERCIAL 913-551-7467	913-551-7211
	FTS 2000: 276-7467	276-7211

PAGE 1 OF 3RECYCLE MUCH EASIER TO RECYCLE THESE

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TOTAL 0:01'47" 3

XEROX TELECOPIER 7020



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REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

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TO: Steve Broslavick K D H E	
FAX NO: (913) 296-1592	
CONFIRMATION NO:	
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COMMENTS

(XEROX COPIER 7020)	FAX MACHINE NO:	VERIFICATION NUMBER:
WSTM	COMMERCIAL 913-551-7063	913-551-7052
SPFD	FTS 2000 276-7063	276-7052
RCRA/IOWA	913-551-7521 OR 276-7521	913-551-7058 OR 276-7058
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MAIL ROOM	COMMERCIAL 913-551-7467	913-551-7211
	FTS 2000: 276-7467	276-7211

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